

EXHIBIT B

Patrick Murphy

From: Patrick Murphy
Sent: Wednesday, October 2, 2024 9:38 PM
To: Paula Colbath
Cc: Scott Ortiz; Scott C. Murray; Marc Gottlieb; murf@bcbv.net; Masterson; MineOne-BCB; Stephen Cohen
Subject: Re: Form W9 and Form AO-213

Paula:

I know it is late in NYC. But I want to send you this final conferral e-mail tonight to seek your agreement on the various extensions, all of which you earlier wrote to me, saying, "...I do think what your (sic) proposing makes sense under the circumstances."

Yes, it makes great sense, Paula.

First, my son Michael is just minutes away from sending you, Erick, and Jiaming the draft settlement agreement he has devoted his whole day and night to writing. Michael has reached out to Erick to ask for another Zoom settlement call with Erick tomorrow, and Michael tells me Erick is trying to juggle his schedule to have that Zoom call with Michael tomorrow. That's good and appreciated.

Second, I hear your concerns about a proposed extension of time until October 29 for BCB to file its Response to MineOne's Motion to Compel and for Sanctions. BCB and I would like to suggest a new proposed extension — to Monday, October 21. Here's why. Michael and I dropped all our litigation efforts on Sunday morning, September 29, to dedicate all our time and energies to trying to reach a settlement of all claims with all Parties. That's what I told you Michael and I would be doing in our September 29 call. Your client representatives, Erick and Jiaming, know and appreciate the efforts and lengths Michael has pursued to negotiate and reach a settlement with them. And Erick and Jiaming have worked very hard, too (per Michael). And Michael will stay devoted to this settlement effort until the very end, even if it takes a few more days. Consequently, he and I stopped working on researching your big Motion on Sunday morning, working instead to pursue a laudable settlement goal and effort.

So we are losing at least a week, maybe 8-9 days, because of our settlement push (and with you now saying you may not reach out to a partner, in Stephen Cohen's absence, to review Michael's draft Settlement Agreement). That would be unfortunate and unnecessary delay, Paula.

Then there was the three-day extension of time the MineOne Defendants received to file their Motion.

Thus, in my mind, I thought, if we ever reach a settlement impasse on/about October 15 — which we should not — Michael and I would need two more weeks to research, write and file BCZb's Response. But, for our conferral purposes tonight [and in any Motion I would file tomorrow if we can't agree], I will ask for an extension of time to October 21 — not October 29 — to file BCB's Response.

Will you please consent to October 21 for BCB's Response? Given the circumstances, especially this "big settlement time-out" we are still in, your extension of time from Judge Hambrick, the intervening depositions of Yiliang Guo, Erick Rengifo and Emory Patterson, and my willingness to extend you the courtesy of reciprocal extensions for your Responses to BCB's pending motions, October 21 is a very reasonable extension, an extension I feel Judge Johnson will grant BCB, even if you object to it.

In return for this much-shortened extension of time to file BCB's Response, I ask that you please withdraw your conditional consent to BCB filing a 25-page over-length Response. You should simply allow to BCB what the Court gave the MineOne Defendants: a 25-page Response. Your consent should not be tethered to an unreasonable demand that your clients receive a ten-page Reply Brief. We'll cross that bridge if we ever have to. Again, I feel Judge Johnson will "afford BCB what MineOne received, a 25-page Response," without linking it, or tying it, to your request for a ten-page Reply.

And finally, you already agreed to the three-week push back on all the briefing deadlines. In fact, you proposed it! Then, in my Response, I agreed with it. Then, in our September 26 oral arguments, we both told/asked Judge Johnson to push back those deadlines by three weeks. I relied on your representation that those deadlines be extended three weeks. You still need to depose Emory Patterson (if we don't settle). And both of us want to incorporate Emory's testimony into our dispositive motions. And, despite Judge Hambrick's Order, three weeks ago, that you provide me available dates for Jiaming's deposition and Haku DU's deposition, you have never provided me with any dates. I need their deposition testimony for BCB's dispositive motions.

Simply stated, I again ask that you please consent to us filing — tomorrow morning — the Stipulated Motion [and proposed Order] I sent you earlier today to move those briefing deadlines back by three weeks.

Thank you, Paula.

Pat Murphy

On Oct 2, 2024, at 6:24 PM, Paula Colbath <pcolbath@loeb.com> wrote:

Pat: I guess we both don't want to wait for things. I certainly don't want to be prejudiced and wait at the train station until October 29th to receive your opposition to my Motion to Compel – which is due on Friday, October 4th. Negotiations and good faith are 2 way streets. I'd think long and hard before filing your threatened motion for time to October 29th. I certainly don't want to see a train wreck caused by your continued bad faith conduct, which has prejudiced your client from the beginning. Had you acted in good faith at the mediation (or even earlier), this case would be have been settled months ago. I can assure you that if I'm buried in responding to yet another one of your frivolous motions, I will not exert myself to find an available corporate partner -- we will wait until Stephen's holiday ends and he is back online on Saturday night, or returns from Florida on Sunday.

Regards,
Paula Colbath

From: Patrick Murphy <pmurphy@wpdn.net>

Sent: Wednesday, October 2, 2024 7:16 PM

To: Paula Colbath <pcolbath@loeb.com>

Cc: Marc Gottlieb <msg@orllp.legal>; murf@bcbv.net; Masterson <masterson@wpdn.net>; MineOne-BCB <MineOne-BCB@loeb.com>; Stephen Cohen <scohen@loeb.com>

Subject: RE: Form W9 and Form AO-213

Paula:

From what I've seen of Michael's working draft, it is not technical. It is plain English, patterned, in great measure, on the language in the BCB/Bitmain Georgia Settlement Agreement.

We don't want to wait until Saturday night – when Mr. Cohen comes back on line – to review and approve the draft Settlement Agreement. So, while I don't feel it is “technical” language, it would be best if you could get one of your Loeb & Loeb transactional lawyers involved to review what I am going to send you around 7:00 pm tonight. We want to keep the settlement train on the tracks tonight.

Pat

<image001.png>

WPDN.NET

<image002.png>

<image003.png>

Patrick J. Murphy

Attorney at Law
Office: 307-265-0700
pmurphy@wpdn.net
159 N. Wolcott St. Suite 400 (82601)
P.O. Box 10700
Casper, WY 82602

PRIVILEGE NOTICE: This email message contains confidential, privileged information intended solely for the addressee. Please do not read, copy or disseminate it unless you are the addressee. If you have received it in error, please call (collect) immediately at (307) 265-0700 and ask to speak with the sender. Also, I would appreciate your forwarding the message back to me and deleting it from your system. Thank you.

FEDERAL TAX ADVICE DISCLAIMER: This email is not tax advice and is not intended for the purposes of avoiding federal tax penalties or promoting, marketing, or recommending to another party any matters addressed herein. IRS Circular 230.

From: Paula Colbath <pcolbath@loeb.com>
Sent: Wednesday, October 2, 2024 4:55 PM
To: Patrick Murphy <pmurphy@wpdn.net>
Cc: Marc Gottlieb <msg@orllp.legal>; murf@bcbv.net; Masterson <masterson@wpdn.net>; MineOne-BCB <MineOne-BCB@loeb.com>; Stephen Cohen <scohen@loeb.com>
Subject: RE: Form W9 and Form AO-213

Thanks for the update. I will be monitoring my emails.

Just as an FYI – I may need input on the Settlement Agreement from one of my corporate partners (I'm not sure how technical Michael's draft will be). As you know, this is Stephen Cohen's client. Stephen is out of the office for the Jewish Holidays and will be offline until Saturday night. I can try to enlist another partner if necessary, depending on the complexity. I did want to give you a heads-up on that.

From: Patrick Murphy <pmurphy@wpdn.net>
Sent: Wednesday, October 2, 2024 6:49 PM
To: Paula Colbath <pcolbath@loeb.com>
Cc: Marc Gottlieb <msg@orllp.legal>; murf@bcbv.net; Masterson <masterson@wpdn.net>; MineOne-BCB <MineOne-BCB@loeb.com>; Stephen Cohen <scohen@loeb.com>
Subject: RE: Form W9 and Form AO-213

Paula:

I haven't yet sent you Michael Murphy's draft Settlement Agreement. I just emailed you saying that Michael just boarded a plane and is flying to Denver. He lands at/near 6:00 pm Mountain. And he needs another hour, once he is on the ground, to finish up his work on it. And I think Michael would like to visit with Erick/Jiaming maybe one more time on some details. Anyway, I hope to email it to you at 7:00 pm Mountain this evening. That's the plan.

Later tonight, at home, I will start writing a proposed Stipulated Motion – and corresponding Order – to Distribute the Attached Funds.

Thank you.

Pat

<image001.png>

WPDN.NET

<image002.png>

<image003.png>

Patrick J. Murphy

Attorney at Law
Office: 307-265-0700
pmurphy@wpdn.net
159 N. Wolcott St. Suite 400 (82601)
P.O. Box 10700
Casper, WY 82602

PRIVILEGE NOTICE: This email message contains confidential, privileged information intended solely for the addressee. Please do not read, copy or disseminate it unless you are the addressee. If you have received it in error, please call (collect) immediately at (307) 265-0700 and ask to speak with the sender. Also, I would appreciate your forwarding the message back to me and deleting it from your system. Thank you.

FEDERAL TAX ADVICE DISCLAIMER: This email is not tax advice and is not intended for the purposes of avoiding federal tax penalties or promoting, marketing, or recommending to another party any matters addressed herein. IRS Circular 230.

From: Paula Colbath <pcolbath@loeb.com>

Sent: Wednesday, October 2, 2024 4:32 PM

To: Patrick Murphy <pmurphy@wpdn.net>

Cc: Marc Gottlieb <msg@orlp.legal>; murf@bcbv.net; Masterson <masterson@wpdn.net>; MineOne-BCB <MineOne-BCB@loeb.com>; Stephen Cohen <scohen@loeb.com>

Subject: RE: Form W9 and Form AO-213

I will review them with the client and we will have them ready to go. Please send me your proposed Stipulated Motion. I'm currently working through an email backlog. Did you forward a draft settlement agreement?

Paula

Paula Colbath
Partner

<image004.jpg>

345 Park Avenue | New York, NY 10154

Direct Dial: [212.407.4905](tel:212.407.4905) | Fax: [212.407.4990](tel:212.407.4990) | E-mail: pcolbath@loeb.com

Los Angeles | New York | Chicago | Nashville | Washington, DC | San Francisco | Beijing | Hong Kong | www.loeb.com

<image005.png>

CONFIDENTIALITY NOTICE: This e-mail transmission, and any documents, files or previous e-mail messages attached to it may contain confidential information that is legally privileged. If you are not the intended recipient, or a person responsible for delivering it to the intended recipient, you are hereby notified that any disclosure, copying, distribution or use of any of the information contained in or attached to this transmission is STRICTLY PROHIBITED. If you have received this transmission in error, please immediately notify the sender. Please destroy the original transmission and its attachments without reading or saving in any manner. Thank you, Loeb & Loeb LLP.

From: Patrick Murphy <pmurphy@wpdn.net>

Sent: Wednesday, October 2, 2024 5:35 PM

To: Paula Colbath <pcolbath@loeb.com>

Cc: Marc Gottlieb <msg@orllp.legal>; murf@bcbv.net; Masterson <masterson@wpdn.net>; MineOne-BCB <MineOne-BCB@loeb.com>; Stephen Cohen <scohen@loeb.com>

Subject: FW: Form W9 and Form AO-213

Paula:

To help facilitate our clients' proposed settlement, the Clerk of the District Court sent me these two forms today.

These two forms need to be completed by our clients – and returned to the Clerk – *before* the Clerk can electronically transfer the attached funds to our clients.

The Clerk told me she thought it would take anywhere from 3-7 days, following Judge Johnson's filing of His Honor's Order Distributing Attached Funds, for the Clerk to then wire the monies to MineOne's account and BCB's account.

My hope is that you and I can file a Stipulated Motion to Distribute the Attached Funds by this Friday, October 4, and that Judge Johnson could receive, review, sign and file the Order Distributing Attached Funds sometime Friday afternoon, October 4.

If we can do that, it will give us a good chance to have the Clerk wire the monies to our clients' accounts by the following Friday, October 11, and maybe before that.

Michael Murphy is on an airplane now but landing soon. It is still Michael and my intent and plan to provide you with a good (but not perfect) working draft of the Settlement Agreement by 5:00 pm Mountain today.

Please call me when you have a moment, Paula.

Pat Murphy
(307) 262-2872 (cell)

<image001.png>

WPDN.NET

<image002.png>

<image003.png>

Patrick J. Murphy

Attorney at Law
Office: 307-265-0700
pmurphy@wpdn.net
159 N. Wolcott St. Suite 400 (82601)
P.O. Box 10700
Casper, WY 82602

PRIVILEGE NOTICE: This email message contains confidential, privileged information intended solely for the addressee. Please do not read, copy or disseminate it unless you are the addressee. If you have received it in error, please call (collect) immediately at (307) 265-0700 and ask to speak with the sender. Also, I would appreciate your forwarding the message back to me and deleting it from your system. Thank you.

FEDERAL TAX ADVICE DISCLAIMER: This email is not tax advice and is not intended for the purposes of avoiding federal tax penalties or promoting, marketing, or recommending to another party any matters addressed herein. IRS Circular 230.

From: Katie Grant <Katie_Grant@wyd.uscourts.gov>

Sent: Wednesday, October 2, 2024 10:26 AM

To: Patrick Murphy <pmurphy@wpdn.net>

Subject: Form W9 and Form AO-213

Good morning, Mr. Murphy,

Attached please find a W9 form in order to disburse funds (with an order of the court). Also attached is an AO-213 form in order to disburse payment via EFT (electronic funds transfer).

Again, once we have a signed order, we will first initiate a \$5 test payment to ensure no issues with the banking information, etc., and then will disburse the remaining funds upon confirmation of receipt of the test payment.

Please have any completed forms returned to me. Let me know if you have any questions.

Thank you,

Katie Grant
Financial Administrator
U.S. District Court – District of Wyoming
2120 Capitol Avenue, Rm 2131
Cheyenne, WY 82001
(307)433-2133

This email has been scanned for spam and viruses. Click [here](#) to report this email as spam.

This email has been scanned for spam and viruses. Click [here](#) to report this email as spam.

This email has been scanned for spam and viruses. Click [here](#) to report this email as spam.